

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

JPMORGAN CHASE BANK, N.A.,

Plaintiff,

V.

Case No. 1:22-cv-01621-JDW

CHARLIE JAVICE, OLIVIER AMAR,
CHARLIE JAVICE, in her capacity as Trustee
of CHARLIE JAVICE 2021 IRREVOCABLE
TRUST #1, CHARLIE JAVICE, in her capacity as
Trustee of CHARLIE JAVICE 2021
IRREVOCABLE TRUST #2, and CHARLIE
JAVICE in her capacity as Trustee of CHARLIE
JAVICE 2021 IRREVOCABLE TRUST #3,

Defendants.

REQUEST FOR ORAL ARGUMENT PURSUANT TO LOCAL RULE 7.1.4

Pursuant to Rule 7.1.4 of the Local Rules of Civil Practice and Procedure of the United States District Court for the District of Delaware, Defendant Charlie Javice respectfully requests oral argument on her Motion to Partially Lift the PSLRA Discovery Stay to Permit Document Discovery (the “Motion”). D.I. 41. Briefing on the Motion was completed on June 22, 2023. D.I. 43, 47, 51.

OF COUNSEL:

Alex Spiro
Maaren A. Shah
JP Kernisan
QUINN EMANUEL URQUHART
& SULLIVAN, LLP
51 Madison Avenue, 22nd Floor
New York, New York 10010
(212) 849-7000
alexspiro@quinnemanuel.com
maarensah@quinnemanuel.com
jpkernisan@quinnemanuel.com

Dated: June 22, 2023

/s/ Michael A. Barlow

Michael A. Barlow (#3928)
Samuel D. Cordle (#6717)
ABRAMS & BAYLISS LLP
20 Montchanin Drive, Suite 200
Wilmington, Delaware 19807
(302) 778-1000
barlow@abramsbayliss.com
cordle@abramsbayliss.com

*Attorneys for Defendant / Counterclaim
Plaintiff Charlie Javice*